

ADMINISTRATIVE RECORD INDEX  
for the  
CITY INDUSTRIES NPL Site

Vol. 1 1.0 PRE-REMEDIAL

1.8 Preliminary Assessment Documents

- 0001-1. "Potential Hazardous Waste Site - Preliminary Assessment," (October 9, 1984).

1.9 Site Inspection Documents

- 0010-1. "Potential Hazardous Waste Site - Site Inspection Report," Form, Antonio DeAngelo, EPA Region IV (May 23, 1984).
- 0025-2. "Potential Hazardous Waste Site - Site Inspection Report," Form, Keith Grezzik, NUS Corporation (January 28, 1987).

2.0 REMOVAL RESPONSE

2.9 Action Memoranda

- 0044-1. Memorandum from Jan Rogers, EPA Region IV, to Henry Van Cleave, EPA Region IV (DATE UNKNOWN).  
Acknowledgment of changes made to the Action Memorandum submitted for the City Industries site.
- 0046-2. Memorandum from William Hedeman, Jr., EPA Region IV, to Lee Thomas, EPA Region IV (March 1, 1984).  
Requesting authorization for funds for a removal at the City Industries site.

2.10 Pollution Reports (POLREPs)

- 0051-1. Polrep 1, Jan Rogers, EPA Region IV (March 6, 1984).  
Concerning removal activities at the City Industries site.
- 0053-2. Polrep 2, Jan Rogers, EPA Region IV (March 8, 1984).  
Concerning removal activities at the City Industries site.
- 0055-3. Polrep 3, Jan Rogers, EPA Region IV (March 9, 1984).  
Concerning removal activities at the City Industries site.

## 2.10 Pollution Reports (POLREPs) (cont'd.)

- 0057-4. Polrep 4, Jan Rogers, EPA Region IV (March 11, 1984). Concerning removal activities at the City Industries site.
- 0059-5. Polrep 5, Jan Rogers, EPA Region IV (March 13, 1984). Concerning removal activities at the City Industries site.
- 0061-6. Polrep 6, Jan Rogers, EPA Region IV (March 15, 1984). Concerning removal activities at the City Industries site.
- 0063-7. Polrep 7, Jan Rogers, EPA Region IV (March 19, 1984). Concerning removal activities at the City Industries site.
- 0065-8. Polrep 8, Jan Rogers, EPA Region IV (March 22, 1984). Concerning removal activities at the City Industries site.
- 0068-9. Memorandum from Diane Hazaga, EPA Region IV, to Henry Van Cleave, EPA Region IV, and Al Smith, EPA Region IV (April 30, 1984). Concerning removal activities at the City Industries site.
- 0070-10. Memorandum from Diane Hazaga, EPA Region IV, to Henry Van Cleave, EPA Region IV, and Al Smith, EPA Region IV (May 2, 1984). Concerning removal activities at the City Industries site.
- 0072-11. Memorandum from Diane Hazaga, EPA Region IV, to Henry Van Cleave, EPA Region IV, and Al Smith, EPA Region IV (May 3, 1984). Concerning removal activities at the City Industries site.
- 0074-12. Memorandum from Diane Hazaga, EPA Region IV, to Henry Van Cleave, EPA Region IV, and Al Smith, EPA Region IV (May 5, 1984). Concerning removal activities at the City Industries site.
- 0076-13. Memorandum from Diane Hazaga, EPA Region IV, to Henry Van Cleave, EPA Region IV, and Al Smith, EPA Region IV (May 8, 1984). Concerning removal activities at the City Industries site.
- 0078-14. Memorandum from Diane Hazaga, EPA Region IV, to Henry Van Cleave, EPA Region IV, and Al Smith, EPA Region IV (May 25, 1984). Concerning removal activities at the City Industries site.

### 2.10 Pollution Reports (POLREPs) (cont'd.)

- 0080-15. Polrep 16, Diane Hazaga, EPA Region IV, to Henry Van Cleave, EPA Region IV, and Al Smith, EPA Region IV (June 11, 1984). Concerning removal activities at the City Industries site.

## 3.0 REMEDIAL INVESTIGATION (RI)

### 3.1 Correspondence

- 0084-1. Letter from Jerry Kubal, Geraghty & Miller, Inc., to Don Harris, State of Florida Department of Environmental Regulation (February 17, 1988). Summarization of telephone conversation concerning the installation of the Floridan aquifer monitor well.
- 0093-2. Comments from J. Sam Vance, EPA Region IV, on the location, drilling and construction specifications of the Floridan Aquifer Monitor well. (March 16, 1988).
- 0096-3. Letter from Steven T. Walker, Geraghty & Miller, Inc., to Don Harris, State of Florida Department of Environmental Regulation (April 26, 1988). Concerning transmittal of revised technical specifications for the Floridan aquifer monitor well.
- 0104-4. Letter from Don Harris, State of Florida Department of Environmental Regulation, to Steven Walker, Geraghty & Miller, Inc. (April 28, 1988). Concerning review of the revised technical specifications for the Floridan aquifer monitor well.

### 3.2 Sampling and Analysis Data

The Sampling and Analysis Data for the Remedial Investigation (RI) may be reviewed, by appointment only, at EPA Region IV, Atlanta, Georgia. For further information, contact the Records Center at (404) 347-0506.

- 0108-1. "Site Data Augmentation Analytical Data and Quality Assurance Summary Report," Geraghty & Miller, Inc. (May 1988).

### 3.4 Work Plans and Progress Reports

- 0232-1. "City Chemical Company Forsyth Road Contamination Assessment Work Plan," Environmental Science and Engineering, Inc. (September 18, 1984). Concerning the work plan for the Remedial Investigation at the City Industries site.

## 3.4 Work Plans and Progress Reports (cont'd.)

- 0292- 2. "City Chemical Company Forsyth Road Site Phase II Contamination Assessment Work Plan," Environmental Science and Engineering, Inc. (May 10, 1985). Concerning work plan for phase II of the Remedial Investigation at the City Industries site.
- VOL.2  
0373- 3. "City Chemical Company Forsyth Road Site Phase II B Contamination Assessment Work Plan," Environmental Science and Engineering, Inc. (December 6, 1985). Concerning work plan for phase II B of the Remedial Investigation at the City Industries site.
- 0515- 4. "City Chemical Company Forsyth Road Site Sinkhole Assessment Work Plan," Environmental Science and Engineering, Inc. (June 1986). Concerning work plan for sinkhole assessment of the Remedial Investigation at the City Industries site.

## 3.8 Interim Deliverables

- 0537- 1. "Geophysical Study City Chemical Site Orlando, Florida," NUS Corporation (June 8, 1984).

## 3.10 Remedial Investigation (RI) Reports

- 0551- 1. "City Chemical Company Forsyth Road Contamination Assessment Draft Report," Environmental Science and Engineering, Inc. (December 10, 1984).
- 0680- 2. Comments from James Barksdale, EPA Region IV, on the December 10, 1984, "City Chemical Company Forsyth Road Contamination Assessment Draft Report," Environmental Science and Engineering, Inc. (February 19, 1985).
- 0685- 3. "City Chemical Company Forsyth Road Contamination Assessment Phase I Final Report," Environmental Science and Engineering, Inc. (March 1985).
- VOL.3  
0815- 4. "Comments on the Phase II Contamination Assessment - City Chemicals, Forsyth Road," Geraghty & Miller, Inc. (July 30, 1985).
- 0823- 5. "City Chemical Forsyth Road Site Final Report," Environmental Science and Engineering, Inc. (May 1986). Concerning the phase II B report on the City Industries site.

## 3.10 Remedial Investigation (RI) Reports (cont'd.)

- 1072- 6. Comments from Ron Leins, State of Florida Department of Environmental Regulation, on the May 1986 "City Chemical Forsyth Road Site Final Report," Environmental Science and Engineering, Inc. (August 6, 1986).
- Vol. 4 1080- 7. "City Chemical Company Forsyth Road Site Phase II B Report," Environmental Science and Engineering, Inc. (September 1986).
- 1345- 8. Comments from James Barksdale, EPA Region IV, on the "City Chemical Company Forsyth Road Contamination Assessment Phase I Final Report," Environmental Science and Engineering, Inc. and the September 1986 "City Chemical Forsyth Road Site Phase II B Report," Environmental Science and Engineering, Inc. (September 25, 1986).
- 1349- 9. "City Chemical Company Forsyth Road Site Sinkhole Assessment," Environmental Science and Engineering, Inc. (October 1986).
- 1395- 10. Comments from Robert R. Sands, Harris Corporation, on the September 1986 "City Chemical Forsyth Road Site Phase II B Report," Environmental Science and Engineering, Inc. (October 1, 1986).
- 1398- 11. Response from Ron Leins, State of Florida Department of Environmental Regulation on the October 1, 1986 comments from R.R. Sands, Harris Corporation (October 23, 1986). Concerning the "City Chemical Forsyth Road Site Phase II B Report," Environmental Science and Engineering, Inc.
- 1400- 12. Letter from Don Harris, State of Florida Department of Environmental Regulation, to John Vargo, EPA Region IV (September 10, 1987). Concerning transmittal of the State of Florida Department of Environmental Regulation final Quality Assurance Project Audit Report of the Environmental Science and Engineering, Inc. laboratory data for the contamination assessment reports for the City Industries site.
- 1412- 13. Comments from Gail Mitchell, EPA Region IV, on the October 1986 "City Chemical Company Forsyth Road Site Sinkhole Assessment," Environmental Science and Engineering, Inc. (September 15, 1987).

### 3.10 Remedial Investigation (RI) Reports (cont'd.)

- 1415- 14. Response from Jerry Kubal, Geraghty & Miller, Inc., on the September 15, 1987 comments from Gail Mitchell, EPA Region IV (October 5, 1987). Concerning the "City Chemical Company Forsyth Road Site Sinkhole Assessment," Environmental Science and Engineering, Inc.
- 1419- 15. Response from John Vargo, EPA Region IV on the October 5, 1987 comments from Geraghty & Miller, Inc. (November 10, 1987). Concerning the "City Chemical Company Forsyth Road Site Sinkhole Assessment," Environmental Science and Engineering, Inc.
- 1422- 16. Letter from Craig Oural, Geraghty & Miller, Inc., and Steven Walker, Geraghty & Miller, Inc., to Don Harris, Florida Department of Environmental Regulation (July 6, 1989). Concerning transmittal of enclosed July 1989 report "Technical Review of the City Chemical Forsyth Road Sinkhole Assessment".
17. Cross-Reference: Comments from Jeff Starn, EPA Region IV, through Rutherford Hayes, EPA Region IV to Diane Scott, EPA Region IV on the June 1989 "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc. and the Sinkhole Assessment Report (July 26, 1989). [Filed and cited as entry number 9 in 4.9 FEASIBILITY STUDY (FS) - Feasibility Study (FS) Reports]

### 3.11 Health Assessments

- 1435- 1. "Preliminary Health Assessment for City Industries (AKA City Chemical) Cerclis No. FLD055945653, Orange County, Orange, Florida," Agency for Toxic Substances and Disease Registry (April 19, 1989).

### 3.12 Endangerment Assessments

1. Cross-Reference: "Endangerment Assessment for the City Chemical Company Forsyth Road Site, Winter Park, Florida," Geraghty & Miller, Inc. (DATE UNKNOWN). Located in Appendix C of the December 1989 "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc.

### 3.12 Endangerment Assessments (cont'd.)

- 1444- 2. Letter from Diane Scott, EPA Region IV, to Robert Sands, Harris Corporation (March 7, 1989). Concerning transmittal of enclosed comments from Ronald Landy, EPA Region IV on the City Industries site Endangerment Assessment.

## 4.0 FEASIBILITY STUDY (FS)

### 4.1 Correspondence

- 1456- 1. Letter from Dale Twachtmann, State of Florida Department of Environmental Regulation, to Greer Tidwell, EPA Region IV (March 15, 1989). Concerning the State of Florida Department of Environmental Regulation request for EPA Region IV to take the lead management role for City Industries site.

### 4.2 Sampling and Analysis Data

- 1459- 1. Letter from Dan Mercer, City of Winter Park, to (January 8, 1990). Concerning VOC sample results on two water production wells.
- 1465- 2. Letter from John Bateman, County of Orange Environmental Protection Department, to Diane Scott, EPA Region IV (February 22, 1990). Concerning transmittal of sampling data from the Sears storm drain located on Forsyth Road.

### 4.4 Work Plans and Progress Reports

- 1472- 1. "Feasibility Study Plan - City Chemical Site, Forsyth Road," Geraghty & Miller, Inc. (January 1987).
- 1550- 2. Letter from Jerry Kubal, Geraghty & Miller, Inc., to Don Harris, Florida Department of Environmental Regulation (February 29, 1988). Concerning transmittal of the enclosed "Feasibility Study Progress Report - Number 1," Geraghty & Miller, Inc.
- 1556- 3. Letter from Jerry Kubal, Geraghty & Miller, Inc., to Don Harris, Florida Department of Environmental Regulation (March 29, 1988). Concerning transmittal of the enclosed "Feasibility Study Progress Report - Number 2," Geraghty & Miller, Inc.

## 4.4 Work Plans and Progress Reports (cont'd.)

- 1561- 4. Letter from Jerry Kubal, Geraghty & Miller, Inc., to Don Harris, Florida Department of Environmental Regulation (April 27, 1988). Concerning transmittal of the enclosed "Feasibility Study Progress Report - Number 3," Geraghty & Miller, Inc.
- 1565- 5. Letter from Jerry Kubal, Geraghty & Miller, Inc., to Don Harris, Florida Department of Environmental Regulation (May 27, 1988). Concerning transmittal of the enclosed "Feasibility Study Progress Report - Number 4," Geraghty & Miller, Inc.
- 1570- 6. Letter from Jerry Kubal, Geraghty & Miller, Inc., to Don Harris, Florida Department of Environmental Regulation (June 17, 1988). Concerning transmittal of the enclosed "Revised Feasibility Study Progress Report - Number 4," Geraghty & Miller, Inc.
- 1579- 7. Letter from Jerry Kubal, Geraghty & Miller, Inc., to Don Harris, Florida Department of Environmental Regulation (June 28, 1988). Concerning transmittal of the enclosed "Feasibility Study Progress Report - Number 5," Geraghty & Miller, Inc.
- 1584- 8. Letter from Jerry Kubal, Geraghty & Miller, Inc., to Don Harris, Florida Department of Environmental Regulation (July 28, 1988). Concerning transmittal of the enclosed "Feasibility Study Progress Report - Number 6," Geraghty & Miller, Inc.
- 1592- 9. Letter from Jerry Kubal, Geraghty & Miller, Inc., to Don Harris, Florida Department of Environmental Regulation (August 30, 1988). Concerning transmittal of the enclosed "Feasibility Study Progress Report - Number 7," Geraghty & Miller, Inc.
- 1597- 10. Letter from Jerry Kubal, Geraghty & Miller, Inc., to Don Harris, Florida Department of Environmental Regulation (September 30, 1988). Concerning transmittal of the enclosed "Feasibility Study Progress Report - Number 8," Geraghty & Miller, Inc.
- 1602- 11. Letter from Jerry Kubal, Geraghty & Miller, Inc., to Don Harris, Florida Department of Environmental Regulation (October 28, 1988). Concerning transmittal of the enclosed "Feasibility Study Progress Report - Number 9," Geraghty & Miller, Inc.

#### 4.4 Work Plans and Progress Reports (cont'd.)

- 1607- 12. Letter from Jerry Kubal, Geraghty & Miller, Inc., to Don Harris, Florida Department of Environmental Regulation (November 18, 1988). Concerning transmittal of the enclosed "Feasibility Study Progress Report - Number 10," Geraghty & Miller, Inc.

#### 4.7 Applicable or Relevant and Appropriate Requirements (ARARs)

- 1613- 1. Letter from Robert Rhodes, Holland & Knight (Attorney for the City Industries Site Steering Committee, to Thomas Maurer, State of Florida Department of Environmental Regulation (September 30, 1988). Concerning transmittal of attached report that identifies the chemical specific Applicable or Relevant and Appropriate Requirements (ARARs) for groundwater remediation.
- 1620- 2. Letter from Don Harris, Florida Department of Environmental Regulation, to Robert Rhodes, Holland & Knight (Attorney for City Industries Site Steering Committee) (October 5, 1988). Concerning review of the chemical specific Applicable or Relevant and Appropriate Requirements (ARARs) for groundwater remediation at the City Industries site.
- 1622- 3. Memorandum from Glenn Adams, EPA Region IV, to J. Sam Vance, EPA Region IV (October 18, 1988). Concerning Applicable or Relevant and Appropriate Requirements (ARARs) applicable to the City Industries site.
- 1626- 4. Letter from Robert Rhodes, Holland & Knight (Attorney for City Industries Site Steering Committee), to Don Harris, Florida Department of Environmental Regulation (November 14, 1988). Transmittal of enclosed response to State of Florida Department of Environmental Regulation comments on Applicable or Relevant and Appropriate Requirements (ARARs) requirements used as part of the feasibility study evaluation.

4.7 Applicable or Relevant and Appropriate Requirements (ARARs) (cont'd.)

5. Cross-Reference: Letter from Robert Rhodes, Holland & Knight (Attorney for City Industries Site Steering Committee), to Richard Wilkens, State of Florida Department of Environmental Regulation (March 30, 1989). Concerning the issue of Applicable or Relevant and Appropriate Requirements (ARARs) for the feasibility study. [Filed and cited as entry number 4 in 11.7 POTENTIALLY RESPONSIBLE PARTIES (PRP) - PRP Steering Committee Documents]
- 1635- 6. Letter from Robert Rhodes, Holland & Knight (Attorney for the City Industries Site Steering Committee), to Diane Scott, EPA Region IV, and Don Harris, Florida Department of Environmental Regulation (May 3, 1989). Concerning the City Industries Site Steering Committee's position on the issue of Applicable or Relevant and Appropriate Requirements (ARARs) for the City Industries site.
- 1640- 7. Letter from Richard Wilkins, State of Florida Department of Environmental Regulation, to Patrick Tobin, EPA Region IV (June 21, 1989). Concerning Applicable or Relevant and Appropriate Requirements (ARARs) requirements at the City Industries site.
8. Cross-Reference: Letter from Robert Rhodes, Holland & Knight (Attorney for City Industries Site Steering Committee), to Diane Scott, EPA Region IV, and Don Harris, Florida Department of Environmental Regulation (June 29, 1989). Concerning transmittal of the June 1989 revised "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc. [Filed and cited as entry number 8 in 4.9 FEASIBILITY STUDY (FS) - Feasibility Study (FS) Reports]
- 1645- 9. Letter from Patrick Tobin, EPA Region IV, to Richard Wilkins, State of Florida Department of Environmental Regulation (October 13, 1989). Responding to Richard Wilkin's letter of June 21, 1989.
- 1648- 10. Letter from Richard Wilkins, Florida Department of Environmental Regulation to Patrick Tobin, EPA Region IV (January 2, 1990). Concerning clarification of several points regarding ARARs for City Industries site.

#### 4.7 Applicable or Relevant and Appropriate Requirements (ARARs) (cont'd.)

- 1651- 11. Letter from Patrick Tobin, EPA Region IV, to Richard Wilkins, Florida Department of Environmental Regulation (March 29, 1990). Response to Richard Wilkins letter of January 2, 1990 concerning organoleptic threshold concentrations as Applicable or Relevant and Appropriate Requirements (ARARs) for the City Industries Site.

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#### 4.9 Feasibility Study (FS) Reports

- 1661- 1. "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc. (November 1988). This document is a draft report, not a final report as indicated by the title page.

- 2601- 2. Comments from Don Harris, Florida Department of Environmental Regulation, on the November, 1988 "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc. (January 25, 1989).

- 2017- 3. Comments from Diane Scott, EPA Region IV, on the November, 1988 "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc. (February 17, 1989).

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- 0001- 4. Response from Robert Rhodes, Holland & Knight (Attorney for the City Industries Site Steering Committee) on the January 25, 1989 Comments from Don Harris, Florida Department of Environmental Regulation, and the February 17, 1989 comments from Diane Scott, EPA Region IV (April 14, 1989). Concerning the November, 1988 "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc.

- 0020 5. Response from Don Harris, Florida Department of Environmental Regulation, on the April 14, 1989 response to comments from Robert Rhodes, Holland & Knight (Attorney for the City Industries Site Steering Committee) (May 12, 1989). Concerning the November, 1988 "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc.

## 4.9 Feasibility Study (FS) Reports (cont'd.)

- 0038- 6. Response from Diane Scott, EPA Region IV, on the April 14, 1989 response to comments from Robert Rhodes, Holland & Knight (Attorney for the City Industries Site Steering Committee) (May 17, 1989). Concerning the November, 1988 "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc.
- 0042- 7. "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc. (June 1989). This document is a draft report, not a final report as indicated by the title page.
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0476- 8. Letter from Robert Rhodes, Holland & Knight (Attorney for City Industries Site Steering Committee), to Diane Scott, EPA Region IV, and Don Harris, Florida Department of Environmental Regulation (June 29, 1989). Concerning transmittal of the June 1989 revised "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc.
- 0485- 9. Comments from Jeff Starn, EPA Region IV, through Rutherford Hayes, EPA Region IV to Diane Scott, EPA Region IV on the June 1989 "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc. and the Sinkhole Assessment Report (July 26, 1989).
- 0488- 10. Comments from Don Harris, Florida Department of Environmental Regulation, on the June 1989 "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc. (August 31, 1989).
- 0497- 11. Comments from Diane Scott, EPA Region IV, on the June 1989 "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc. (October 20, 1989). Concerning EPA Region IV's disapproval of the City Industries feasibility study.
- 0504- 12. Response from David Bock, Harris Corporation (representing the City Industries Site Steering Committee) on the October 20, 1989 comments from Diane Scott, EPA Region IV (November 3, 1989). Concerning the City Industries feasibility study report.

## 4.9 Feasibility Study (FS) Reports (cont'd.)

- 0509- 13. Letter from Robert Rhodes, Holland & Knight (Attorney for the City Industries Site Steering Committee), to Quentin C. Pair, Department of Justice, and Simon Miller, EPA Region IV. (November 9, 1989). Concerning steering committee meeting with EPA and technical staff to discuss the status of the preparation of the final Feasibility Study Report.
- 0512- 14. Letter from Diane Scott, EPA Region IV to David Bock, Harris Corporation (December 7, 1989). Regarding corrections to the October 20, 1989 letter from Diane Scott, EPA Region IV on the June 1989 "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc.
- 0515- 15. "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc. (December 8, 1989). This document is dated June 1989 but contains the revised pages received from Geraghty & Miller, Inc., in December 1989.
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0961- 16. Letter from Robert Rhodes, Jr., Holland and Knight (Attorney for City Industries Site Steering Committee), to Dan DiDomenico, State of Florida Department of Environmental Regulation (January 22, 1990). Transmitting backup information for the feasibility study report with regards the the surficial aquifer and its use as a drinking supply.
- 1067- 17. Comments from Don Harris, State of Florida Department of Environmental Regulation, on the June 1989 (updated December 1989) "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc. (January 24, 1990).
- 1071- 18. Memorandum from Diane Scott, EPA Region IV, to Camilla Warren, EPA Region IV (February 1, 1990). Concerning corrected values to three tables from Appendix C of the June 1989 (updated December 1989) "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc.
- 1075- 19. Letter from Don Harris, Florida Department of Environmental Regulation, to Diane Scott, EPA Region IV (February 9, 1990). Concerning water use in the area of the City Industries Site.
- 1078- 20. "City Chemical Site Feasibility Study Revisions," Geraghty & Miller, Inc. (May 17, 1990).

4.10 Proposed Plans for Selected Remedial Action  
(cont'd.)

- 1108- 1. "Superfund Proposed Plan Fact Sheet - City Chemical Site, Winter Park, Florida," EPA Region IV (January 1990).
- 1117- 2. Letter from Ernest West, Jr., South Seminole & North Orange County Wastewater Transmission Authority, to Camilla Warren, EPA Region IV (March 2, 1990). Concerning comments on Alternative No. 2 of EPA Region IV's proposed plan.
- 1120- 3. Letter from Kim Taylor, Citizen, to Diane Scott, EPA Region IV (March 5, 1990). Concerning comments on Alternative No. 2 of EPA Region IV's Proposed Plan.
- 1122- 4. Letter from Robert Rhodes, Holland & Knight (City Chemical Site Steering Committee), to Diane Scott, EPA Region IV (March 6, 1990). Concerning comments on the "Superfund Proposed Plan Fact Sheet - City Chemical Site, Winter Park, Florida," EPA Region IV.
- 1125- 5. Letter from Byron Brooks, County of Orange, to Diane Scott, EPA Region IV (March 6, 1990). Concerning comments on Alternative No. 3 of EPA Region IV's proposed plan.
- 1128- 6. Letter from Thomas Lothrop, City of Orlando, to Diane Scott, EPA Region IV (March 8, 1990). Transmittal and elaboration on the City of Orlando's Position Statement regarding Alternative No. 2 of EPA Region IV's proposed plan.
- 1133- 7. Letter from Greer Tidwell, EPA Region IV, to Robert Haven, City of Orlando Department of Public Works (April 2, 1990). Response to the City of Orlando's expressed concerns over the Alternative No. 2 of the "Superfund Proposed Plan Fact Sheet - City Chemical Site, Winter Park, Florida," EPA Region IV.
- 1136- 8. Letter from Dale Twachtman, State of Florida Department of Environmental Regulation, to Greer Tidwell, EPA Region IV (April 11, 1990). Concerning the Florida Department of Environmental Regulation's concurrence with EPA Region IV's recommended action for the remediation at the City Industries site.

#### 4.10 Proposed Plans for Selected Remedial Action (cont'd.)

- 1138- 9. Letter from Diane Scott, EPA Region IV, to Robert Rhodes, Holland & Knight (City Chemical Site Steering Committee) (April 12, 1990). Response to Robert Rhodes's letter of March 6, 1990 concerning EPA Region IV's proposed plan for the City Industries Site.
- 1141- 10. Letter from Diane Scott, EPA Region IV, to Byron Brooks, County of Orange (April 16, 1990). Response to Byron Brooks' letter of March 6, 1990 concerning EPA Region IV's proposed plan for the City Industries Site.
- 1145- 11. Letter from Camilla Warren, EPA Region IV, to Ernest West, South Seminole and North Orange County Wastewater Transmission Authority (April 16, 1990). Response to Ernest West's letter of March 2, 1990 concerning EPA Region IV's proposed plan for the City Industries Site.

#### 5.0 RECORD OF DECISION (ROD)

##### 5.9 Record of Decision (ROD)

- 1150- 1. "Record of Decision - Summary of Remedial Alternative Selection - City Industries (City Chemical) Site - Winter Park, Florida," EPA Region IV (March 29, 1990).

#### 10.0 ENFORCEMENT

##### 10.6 State and Local Enforcement Records

- 1228- 1. Order, State of Florida, Department of Environmental Regulation and the City of Sanford, A Florida Municipal Corporation, Plaintiffs vs. City Industries, Inc., a Florida Corporation, City Chemical Company, a Florida Corporation, and Arthur Greer, Defendants, In the Circuit Court of the Eighteenth Judicial Circuit Seminole County, Florida, Case no. 80-2541-ca-17-L (September 10, 1981).

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- 1294- 2. "City Chemical Site Feasibility Study Agreement," State of Florida Department of Environmental Regulation and Participants (Those companies listed on Exhibit A to this agreement) (November 13, 1981).

## 10.11 EPA Administrative Orders (cont'd.)

- 1418- 1. Order, In the Matter of City Industries, Inc. (AKA City Chemical Company) Orlando, Florida and Arthur Greer, Respondents, Docket no. 84-03-C (February 13, 1984).

## 10.12 EPA Consent Decrees

- 1426- 1. Consent Decree, United States v. City Industries, Inc., et al., Defendants, United States District Court for the Middle District of Florida, Civil Action No. 87-472-CIV-ORL-18 (July 6, 1988).
- 1612- 2. Motion to Lodge Partial Consent Decree, United States of America, Plaintiff, v. City Industries, Inc., et al., United States District Court for the Middle District of Florida, Civil Action No. 87-472-CIV-ORL-18 (July 6, 1988).
- 1615- 3. Memorandum of Points and Authorities in Support of Motion to Lodge Partial Consent Decree, United States, Plaintiff, v. City Industries, Inc., et al., Defendants, United States District Court for the Middle District of Florida (July 6, 1988).

## 10.14 Pleadings -- Directly Related to Trial

- 1621- 1. Order to Amend Complaint, United States, Plaintiff, v. City Industries, Inc., et al., Defendants, United States District Court for the Middle District of Florida, Civ. No. 87-472-CIV-ORL-18 (July 6, 1988).
- 1631- 2. Motion for Leave to File First Amended Complaint, United States, Plaintiff, v. City Industries, Inc., et al., United States District Court for the Middle District of Florida, Civ. No. 87- 472-CIV-ORL-18 (July 6, 1988).
- 1634- 3. Memorandum of Points and Authorities in Support of Motion for Leave to File First Amended Complaint, United States, Plaintiff, v. City Industries, Inc., et al., Defendants, United States District Court for the Middle District of Florida, Civ. No. 87-472-CIV-ORL-18 (July 6, 1988).
- 1642- 4. First Amended Complaint, United States, Plaintiff, v. City Industries, Inc., et al., Defendants, United States District Court for the Middle District of Florida, Civ. No. 87-472-CIV-ORL-18 (July 6, 1988).

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## 11.0 POTENTIALLY RESPONSIBLE PARTIES (PRP)

11.1 General and Contractor-Related Correspondence  
(cont'd.)

- 1668- 1. Master letter from EPA Region IV to the Potentially Responsible Parties for the City Industries site (August 7, 1986). Concerning notification of liability to the Hazardous Substances Response Trust Fund for cleanup expenditures and the City Industries site.

## 11.2 PRP Lists

- 1672- 1. List of Potentially Responsible Parties (PRPs) for the City Industries site (DATE UNKNOWN). This list was part of the First Amended Complaint filed on July 6, 1988.

## 11.7 PRP Steering Committee Documents

- 1.- Cross-Reference: Letter from Robert Rhodes, Holland & Knight (Attorney for the City Industries Site Steering Committee, to Thomas Maurer, State of Florida Department of Environmental Regulation (September 30, 1988). Concerning transmittal of attached report that identifies the chemical specific Applicable or Relevant and Appropriate Requirements (ARARs) for groundwater remediation. [Filed and cited as entry number 1 in 4.7 FEASIBILITY STUDY (FS) - Applicable or Relevant and Appropriate Requirements (ARARs)]
- 2.. Cross-Reference: Letter from Don Harris, Florida Department of Environmental Regulation, to Robert Rhodes, Holland & Knight (Attorney for City Industries Site Steering Committee) (October 5, 1988). Concerning review of the chemical specific Applicable or Relevant and Appropriate Requirements (ARARs) for groundwater remediation at the City Industries site. [Filed and cited as entry number 2 in 4.7 FEASIBILITY STUDY (FS) - Applicable or Relevant and Appropriate Requirements (ARARs)]

## 11.7 PRP Steering Committee Documents (cont'd.)

3. Cross-Reference: Letter from Robert Rhodes, Holland & Knight (Attorney for City Industries Site Steering Committee), to Don Harris, Florida Department of Environmental Regulation (November 14, 1988). Transmittal of enclosed response to State of Florida Department of Environmental Regulation comments on Applicable or Relevant and Appropriate Requirements (ARARs) requirements used as part of the feasibility study evaluation. [Filed and cited as entry number 4 in 4.7 FEASIBILITY STUDY (FS) - Applicable or Relevant and Applicable or Relevant and Appropriate Requirements (ARARs)]
- 1686- 4. Letter from Robert Rhodes, Holland & Knight (Attorney for City Industries Site Steering Committee), to Richard Wilkens, State of Florida Department of Environmental Regulation (March 30, 1989). Concerning the issue of Applicable or Relevant and Appropriate Requirements (ARARs) for the feasibility study.
- 5.- Cross-Reference: Response from Robert Rhodes, Holland & Knight (Attorney for the City Industries Site Steering Committee) on the January 25, 1989 Comments from Don Harris, Florida Department of Environmental Regulation, and the February 17, 1989 comments from Diane Scott, EPA Region IV (April 14, 1989). Concerning the November, 1988 "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc. [Filed and cited as entry number 4 in 4.9 FEASIBILITY STUDY (FS) - Feasibility Study]
- 6.- Cross-Reference: Letter from Robert Rhodes, Holland & Knight (Attorney for the City Industries Site Steering Committee), to Diane Scott, EPA Region IV, and Don Harris, Florida Department of Environmental Regulation (May 3, 1989). Concerning the City Industries Site Steering Committee's position on the issue of Applicable or Relevant and Appropriate Requirements (ARARs) for the City Industries site. [Filed and cited as entry number 6 in 4.7 FEASIBILITY STUDY (FS) - Applicable or Relevant and Appropriate Requirements (ARARs)]

## 11.7 PRP Steering Committee Documents (cont'd.)

- 7.-Cross-Reference: Response from Don Harris, Florida Department of Environmental Regulation, on the April 14, 1989 response to comments from Robert Rhodes, Holland & Knight (Attorney for the City Industries Site Steering Committee) (May 12, 1989). Concerning the November, 1988 "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc. [Filed and cited as entry number 5 in 4.9 FEASIBILITY STUDY (FS) - Feasibility Study (FS) Reports]
- 8.-Cross-Reference: Response from Diane Scott, EPA Region IV, on the April 14, 1989 response to comments from Robert Rhodes, Holland & Knight (Attorney for the City Industries Site Steering Committee) (May 17, 1989). Concerning the November, 1988 "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc. [Filed and cited as entry number 6 in 4.9 FEASIBILITY STUDY (FS) - Feasibility Study (FS) Reports]
- 9.-Cross-Reference: Letter from Robert Rhodes, Holland & Knight (Attorney for City Industries Site Steering Committee), to Diane Scott, EPA Region IV, and Don Harris, Florida Department of Environmental Regulation (June 29, 1989). Concerning transmittal of the June 1989 revised "Final Report - Feasibility Study: City Chemical Site, Winter Park, Florida," Geraghty & Miller, Inc. [Filed and cited as entry number 8 in 4.9 FEASIBILITY STUDY (FS) - Feasibility Study (FS) Reports]
- 10.-Cross-Reference: Letter from Robert Rhodes, Holland & Knight (Attorney for the City Industries Site Steering Committee), to Quentin C. Pair, Department of Justice, and Simon Miller, EPA Region IV. (November 9, 1989). Concerning steering committee meeting with EPA and technical staff to discuss the status of the preparation of the final Feasibility Study Report. [Filed and cited as entry number 13 in 4.9 FEASIBILITY STUDY (FS) - Feasibility Study (FS) Reports]
- 11.-Cross-Reference: Letter from Robert Rhodes, Holland & Knight (Attorney for City Industries Site Steering Committee), to Suzanne Durham, EPA Region IV (November 20, 1989). Concerning development of community relations plan. [Filed and cited as entry number 4 in 13.1 COMMUNITY RELATIONS - Correspondence]

## 11.7 PRP Steering Committee Documents (cont'd.)

- 12.- Cross-Reference: Letter from Robert Rhodes, Jr., Holland and Knight ( Attorney for City Industries Site Steering Committee), to Dan DiDomenico, State of Florida Department of Environmental Regulation (January 22, 1990). Transmitting backup information for the feasibility study report with regards the the surficial aquifer and its use as a drinking supply. [Filed and cited as entry number 16 in 4.9 FEASIBILITY STUDY (FS) - Feasibility Study (FS) Reports]
- 13.-Cross-Reference: Letter from Robert Rhodes, Holland & Knight (City Chemical Site Steering Committee), to Diane Scott, EPA Region IV (March 6, 1990). Concerning comments on the "Superfund Proposed Plan Fact Sheet - City Chemical Site, Winter Park, Florida," EPA Region IV. [Filed and cited as entry number 4 in 4.10 FEASIBILITY STUDY (FS) - Proposed Plans for Selected Remedial Action]
- 14.-Cross-Reference: Letter from Diane Scott, EPA Region IV, to Robert Rhodes, Holland & Knight (City Chemical Site Steering Committee) (April 12, 1990). Response to Robert Rhodes's letter of March 6, 1990 concerning EPA Region IV's proposed plan for the City Industries Site. [Filed and cited as entry number 9 in 4.10 FEASIBILITY STUDY (FS) - Proposed Plans for Selected Remedial Action]

## 11.9 PRP-Specific Correspondence

- Documents concerning the Potentially Responsible Parties (PRP) for the City Industries site may be reviewed, by appointment only, at EPA Region IV Records Center, Atlanta, GA, (404) 347-0506.

## 13.0 COMMUNITY RELATIONS

## 13.1 Correspondence

- 1714- 1. Letter from Dale Twachtmann, Florida Department of Environmental Regulation, to Greer Tidwell, EPA Region IV (August 17, 1989). Concerning the acceptance of treated water by the city of Orlando as a result of the cleanup at the City Industries site.

## 13.0 COMMUNITY RELATIONS

## 13.1 Correspondence (cont'd.)

- 1718- 2. Letter from David Johnston, City Of Winter Park, to Greer Tidwell, EPA Region IV (October 5, 1989). Concerning the cleanup of the City Industries Site.
- 1721- 3. Letter from Robert Congleton, Well Owner, to Diane Scott, EPA Region IV (November 10, 1989). Inquiring about the shallow well water test results.
- 1724- 4. Letter from Robert Rhodes, Holland & Knight (Attorney for City Industries Site Steering Committee), to Suzanne Durham, EPA Region IV (November 20, 1989). Concerning development of community relations plan.
- 1726- 5. Letter from Greer Tidwell, EPA Region IV to David Johnston, City Of Winter Park (December 6, 1989). Regarding the October 5, 1989 letter from David Johnston, City of Winter Park.
- 1733- 6. Letter from Diane Scott, EPA Region IV, to Robert Melanson, Winter Park Library (December 18, 1989). Concerning designation of Winter Park Library as site repository for the City Industries site.
- 1736- 7. Letter from Diane Scott, EPA Region IV, to Tom Ackert, County Administrator's office (December 18, 1989). Regarding information requested by the EPA Region IV about the City Industries site.
- 1740- 8. Letter from Diane M. Scott, EPA Region IV to Robert Congleton, Well Owner (December 18, 1989). Concerning sampling of private wells in the vicinity of the.
- 1743- 9. Letter from Greer Tidwell, EPA Region IV, to Robert Haven, City of Orlando (January 5, 1990). Concerning EPA Region IV's position on the settlement of the Iron Bridge civil action.
- 1746- 10. Letter from Bryon Brooks, County of Orange, to Diane Scott, EPA Region IV (January 23, 1990). Concerning the County of Orange's opportunity to participate in the community relations activities at the City Industries Site.

## 13.0 COMMUNITY RELATIONS

## 13.1 Correspondence (cont'd.)

- 1748-11. Letter from Diane Scott, EPA Region IV, to Robert Melanson, Winter Park Public Library (February 5, 1990). Concerning transmittal of the Administrative Record for the City Industries Site.
- 1750-12. Letter from Jo Ann Jackson, Citizen, to Diane Scott, EPA Region IV (February 7, 1990). Concerning a request for a copy of the Feasibility Study for the City Industries Site.
- 1752-13. Letter from Greer Tidwell, EPA Region IV, to Dale Twachtmann, State of Florida Department of Environmental Regulation (February 8, 1990). Response to Dale Twachtmann's letter of August 17, 1989 concerning acceptance of wastewater to Orlando's sewer system from the City Industries Site.
- 1755-14. Letter from L. Gary Miller, Forsyth Land Company, to Diane Scott, EPA Region IV (February 28, 1990). Concerning request for minutes of public meeting held February 7, 1990 in Winter Park, FL.
15. Cross-Reference: Letter from Ernest West, Jr., South Seminole & North Orange County Wastewater Transmission Authority, to Camilla Warren, EPA Region IV (March 2, 1990). Concerning comments on Alternative No. 2 of EPA Region IV's proposed plan. [Filed and cited as entry number 2 in 4.10 FEASIBILITY STUDY (FS) - Proposed Plans for Selected Remedial Action]
16. Cross-Reference: Letter from Kim Taylor, Citizen, to Diane Scott, EPA Region IV (March 5, 1990). Concerning comments on Alternative No. 2 of EPA Region IV's Proposed Plan. [Filed and cited as entry number 3 in 4.10 FEASIBILITY STUDY (FS) - Proposed Plans for Selected Remedial Action]
17. Cross-Reference: Letter from Byron Brooks, County of Orange, to Diane Scott, EPA Region IV (March 6, 1990). Concerning comments on Alternative No. 3 of EPA Region IV's proposed plan. [Filed and cited as entry number 5 in 4.10 FEASIBILITY STUDY (FS) - Proposed Plans for Selected Remedial Action]

## 13.0 COMMUNITY RELATIONS

## 13.1 Correspondence (cont'd.)

- 18.-Cross-Reference: Letter from Thomas Lothrop, City of Orlando, to Diane Scott, EPA Region IV (March 8, 1990). Transmittal and elaboration on the City of Orlando's Position Statement regarding Alternative No. 2 of EPA Region IV's proposed plan. [Filed and cited as entry number 6 in 4.10 FEASIBILITY STUDY (FS) - Proposed Plans for Selected Remedial Action]
- 1765- 19. Letter from Diane Scott, EPA Region IV, to L. Gary Miller, Forsyth Land Company (March 8, 1990). Response to L. Gary Miller's letter of February 28, 1990 concerning request for minutes of public meeting for the City Industries Site.
- 1768- 20. Letter from Diane Scott, EPA Region IV, to Kim Taylor, Citizen (March 29, 1990). Response to Kim Taylor's letter requesting information about the chemicals found in the shallow ground water at the City Industries Site. Includes toxicological profiles from the Agency for Toxic Substances and Disease Registry.
- 21.- Cross-Reference: Letter from Greer Tidwell, EPA Region IV, to Robert Haven, City of Orlando Department of Public Works (April 2, 1990). Response to the City of Orlando's expressed concerns over the Alternative No. 2 of the "Superfund Proposed Plan Fact Sheet - City Chemical Site, Winter Park, Florida," EPA Region IV. [Filed and cited as entry number 7 in 4.10 FEASIBILITY STUDY (FS) - Proposed Plans for Selected Remedial Action]
- 1825- 22. Letter from Robert Haven, City of Orlando, to Greer Tidwell, EPA Region IV (April 6, 1990). Response to Greer Tidwell's letter of April 2, 1990 regarding the City Industries Site.
- 23.- Cross-Reference: Letter from Diane Scott, EPA Region IV, to Byron Brooks, County of Orange (April 16, 1990). Response to Byron Brooks' letter of March 6, 1990 concerning EPA Region IV's proposed plan for the City Industries Site. [Filed and cited as entry number 10 in 4.10 FEASIBILITY STUDY (FS) - Proposed Plans for Selected Remedial Action]

### 13.0 COMMUNITY RELATIONS

#### 13.1 Correspondence (cont'd.)

- 24.- Cross-Reference: Letter from Camilla Warren, EPA Region IV, to Ernest West, South Seminole and North Orange County Wastewater Transmission Authority (April 16, 1990). Response to Ernest West's letter of March 2, 1990 concerning EPA Region IV's proposed plan for the City Industries Site. [Filed and cited as entry number 11 in 4.10 FEASIBILITY STUDY (FS) - Proposed Plans for Selected Remedial Action]

#### 13.6 Community Relations Plans

- 1831- 1. "Community Relations Plan City Industries Site, Winter Park, Florida," Resource Applications, Inc. (January 26, 1990).

#### 13.9 Fact Sheets

- 1860-1. "Current Status on City Chemical Company Hazardous Waste Site, Forsyth Road, Winter Park," State of Florida Department of Environmental Regulation (December 18, 1985).

#### 13.10 Technical Assistance Grants

- 1865- 1. Letter from Jim Doyle, EPA Region IV, to Debbie Reinhart, University of Central Florida Civil and Environmental Department (February 28, 1990).